

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA

MARCELA OLVERA-MORALES, ON BEHALF)
OF HERSELF AND ALL OTHERS SIMILARLY)
SITUATED,)

Plaintiffs,)

v.)

Case No. 1:05CV00559

INTERNATIONAL LABOR MANAGEMENT)
CORPORATION, INC., NORTH CAROLINA)
GROWERS' ASSOCIATION, INC., and DEL-AL)
ASSOCIATES, INC.,)

Defendants.)

ILMC'S DESIGNATIONS IN RESPONSE
TO CLASS PLAINTIFFS'
TRIAL DEPOSITION DESIGNATIONS

Defendant International Labor Management Corporation, Inc. ("ILMC"), hereby submits its designations in response to Class Plaintiffs' Trial Deposition Designations (hereinafter, "Plaintiffs' Designations"). ILMC reserves the right to object on legitimate grounds to any testimony designated by the Plaintiffs. Without waiving this right, ILMC would add the following designations, all from the Deposition of Juan del Alamo taken by the Plaintiffs on January 23, 2007:

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Page 17, lines 5-6

Page 18, lines 18-25

Page 19, lines 1-11

Page 20, lines 23-25

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Page 33, lines 8-14

Page 42, lines 10-25

Page 43, lines 1-17

Page 46, lines 3-25

Page 47, lines 1-6

Page 47, lines 17-19

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Page 53, lines 1-13

Page 82, lines 7-13

Page 88, lines 9-22

Page 94, lines 22-24

Page 125, lines 23-25

Page 126, lines 1-9

Page 126, lines 18-25

Page 127, lines 1-4

Page 132, lines 2-11

Page 153, lines 5-25

Page 154, lines 1-4

Page 171, lines 13-18

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Page 172, lines 1-18

Page 218, lines 17-20

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Page 243, lines 1-19

Page 253, lines 1-25

Page 254, lines 1-25

Page 255, lines 1-19

Page 263, lines 24-25

Page 264, lines 1-2

This the 16th day of April, 2008.

/s/ W. R. Loftis, Jr.

W. R. Loftis, Jr.

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*Attorneys for Defendant International Labor
Management Corporation, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2008, I electronically filed **ILMC's DESIGNATIONS IN RESPONSE TO CLASS PLAINTIFFS' TRIAL DEPOSITION DESIGNATIONS** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: **Nathan B. Atkinson, Carol Brooke, Timothy Casey, Ryan M. Debski, Gary L. Fuller, W. R. Loftis, Jr., Jeffrey D. Patton, Andrew D. Stillufsen and Daniel Werner** and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

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